

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Melissa L Cecolini : CASE NO.: 19-17459-mdc
:
Debtor. : CHAPTER 7

Melissa L. Cecolini,	:	
	:	
Movant,	:	MOTION FOR REDEMPTION
	:	11 U.S.C § 722
	:	
v.	:	
	:	
Prudential Bank	:	
	:	
Respondent.	:	

STIPULATION RESOLVING MOTION TO REDEEM

1. Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on November 29, 2019.
2. Debtor filed a Motion to Redeem Property of the Estate on February 6, 2020 pertaining to a 2002 Skyline Manufactured Home.
3. The parties now seek to enter into this Stipulation to resolve the Motion to Redeem.
4. To that end, the parties agree as follows:
 - a. The 2002 Skyline Manufactured home is tangible personal property for primarily personal, family, or household use of the Debtor.
 - b. The debt owing the Respondent is a dischargeable consumer debt.
 - c. The property is exempt or has been abandoned by the estate.
 - d. The value of the property, and the allowed secured claim of the Respondent that is secured by a lien on the property, the “redemption amount” is \$35,000.00.

- e. Debtor shall have sixty (60) days to provide \$35,000.00 to Respondent in order to redeem the property.
- f. Upon timely receipt of such payment, the Respondent shall release its lien of record.
5. Electronic and/or facsimile signatures shall be treated as an original signature for purposes of this Stipulation.
6. The parties specifically request the Court adopt the attached Order; however, if the Court, for any reason, does not enter the Order, this Stipulation shall be null and void and of no consequence.

Date: 4/28/2020

DocuSigned by:
Patrick Best
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Patrick J. Best, Esq.
Attorney for Debtor/Movant

Date: 4/30/2020

DocuSigned by:
Michael Vagnoni
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Michael Vagnoni, Esq.
Counsel for Respondent
Prudential Bank